

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAAK, ATTILIO PO
and KARL LEIBINGER, on behalf of themselves
and those similarly situated,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 03-CV-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS, L.L.C., a
Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10411 (PBS)

GARY B. FILLER and LAWRENCE PERLMAN,
Trustees of the TRA Rights Trust,
Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10477 (PBS)

JANET BAKER and JAMES BAKER, JKBAKER LLC
and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10501 (PBS)

**PLAINTIFFS' RESPONSE TO THE NOTICE OF WRITTEN QUESTIONS OF DEXIA
BANK BELGIUM TO BE APPENDED TO REQUEST FOR INTERNATIONAL
JUDICIAL ASSISTANCE (LETTERS ROGATORY)**

On July 31, 2006, Dexia Bank Belgium (“Dexia”), filed and served its Notice of Written Questions, providing proposed cross-examination questions to be appended to Plaintiffs’ Request for International Judicial Assistance (Letters Rogatory) (“Letters Rogatory”), which was filed on June 16, 2006. Plaintiffs submit this short Response to state objections to certain of Dexia’s questions and to submit limited proposed re-direct examination questions.

Attached hereto as **Exhibit 1** are Plaintiffs’ Objections to the form of Dexia’s proposed cross-examination questions to the Plaintiffs’ Letters Rogatory questions. The attached chart lists certain general objections, as well as specific objections to particular questions (e.g., improper leading question). Plaintiffs submit these objections for the record to preserve their rights in the event that Plaintiffs are not permitted by the Belgian authorities to be present during the examination of the proposed witnesses. Plaintiffs submit that it is not necessary for this Court to consider or rule upon these objections at this time, but rather may address them when or if Dexia later seeks to submit testimony obtained through the letters rogatory process.

Attached hereto as **Exhibit 2** is a series of re-direct questions prompted by Dexia’s proposed cross-examination questions.

Dated: August 14, 2006

Respectfully submitted,

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